

From: [Doris Yau](#)
To: [Rose-Anne Hawkeswood](#)
Subject: RE: Bowdens Silver
Date: Tuesday, 28 March 2023 4:24:05 PM
Attachments: [image001.png](#)
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Hi Rose-Anne,

Hazard Audit is a typical hazard condition for potentially hazardous development. Although HIPAP 12 published in 2011 has suggested to undertake a Hazard Audit three-yearly, the approval requirements are different as follows:

Lowest level of risk: conducting a hazard audit without any approval and submission requirement

Medium level of risk: conducting a hazard audit without any approval requirement but submit to consent authority

Highest level of risk: conducting a hazard audit to be submitted and approved by the consent authority

In addition, only for the highest risk level of development is recommended with a three-yearly hazard audit and required to be approved by consent authority. This highest risk level of development ranges from bulk liquid fuel terminal to Ammonium Nitrate production facility. In the recent year, the medium risk level of development is often recommended with five-yearly hazard audit. The five-year period is recommended to avoid nuisance when the operation is relatively stable or involves simple processing. Examples of such developments are Dangerous goods warehousing facility or decanting facility.

For Bowdens Silver, the process is not considered as complex. It involves mixing the Solid Sodium Cyanide in water to form Sodium Cyanide solution, then feed into flotation circuits and to be reacted away. The potential hazards associated with handling sodium cyanide and from the process are expected to be low and imposing a three-yearly hazard audit requirement is considered as onerous. Given appropriate safeguards are in place including (1) the process will include addition of caustic soda to prevent formation of hydrogen cyanide gas, and (2) Sodium Cyanide solution will not be in contact with acidic substance as no acid is stored or used in the process, the proposal will likely be considered as low risk level of development.

Considering the development is far away from residential uses and based on the reasons above, our team does not believe a hazard audit requirement is necessary when various legislations and requirements are also imposed on this mine-site, such as those imposed via conditions B1 to B6.

Let me know if you need anything else.

Regards,
Doris

From: Rose-Anne Hawkeswood <[REDACTED]>
Sent: Tuesday, 28 March 2023 2:07 PM